

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>  
Debtors.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR  
ELECTRONIC NOTICE FOR UNITED STATES  
GOVERNMENT ATTORNEY BENJAMIN KELLY**

PLEASE TAKE NOTICE that the Pension Benefit Guaranty Corporation (“PBGC”), an agency of the United States Government and a creditor in the above-captioned cases, hereby files this notice of appearance and request for electronic notice pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and requests, pursuant to Section 1109(b) of Title 11, United States Code and Bankruptcy Rules 2002(j)(4), 3017(d) and 9007, that notice of all matters which may come before the Court concerning the above-captioned cases and debtors be given to and served upon PBGC as listed below.

This request includes, *inter alia*, the notices and papers referred to in Bankruptcy Rules 2002, 3017 (including all disclosure statements and plans of reorganization) and 9007, notices of any orders, applications, complaints, demands, hearings, motions, petitions, pleadings or requests, and any other documents brought before this Court in these cases, whether formal or informal, ex parte or on notice, written or oral, or transmitted or conveyed by mail, electronic mail, personal delivery, telephone, facsimile, or otherwise.

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 511500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

PLEASE TAKE FURTHER NOTICE that this entry of appearance and request for notice is without prejudice to PBGC's rights, remedies, and claims against other entities or any objection that may be made to the jurisdiction or venue of the Court or venue of these cases, and shall not be deemed or construed to be a waiver of PBGC's rights: (i) to have final orders and non-core matters entered only after *de novo* review by a district court, (ii) to trial by jury in any proceedings so triable in these cases or in any controversy or proceeding related to these cases, (iii) to have the district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert any other rights, claims, actions, defenses, setoffs or recoupments to which PBGC is or may be entitled in law or in equity, all of which PBGC expressly reserves.

Dated: January 25, 2024  
Washington, D.C.

Respectfully submitted,

/s/ Benjamin Kelly

Benjamin Kelly, Deputy Assistant General Counsel  
Bar No. DC 1632617

Pension Benefit Guaranty Corporation

Office of the General Counsel

445 12<sup>th</sup> Street, S.W.

Washington, D.C. 20024

Telephone: (202) 229-4097

Emails: kelly.benjamin@pbgc.gov and  
efile@pbgc.gov

**CERTIFICATE OF SERVICE**

I hereby certify, that on this 25<sup>th</sup> day of January 2024, the **Notice of Appearance and Request for Electronic Notice for United States Government Attorney Benjamin Kelly** and the **Certification of United States Government Attorney Benjamin Kelly** were served via CM/ECF on all parties registered to receive notices for these cases:

<p><b>Patrick J. Nash, Jr.</b> (admitted <i>pro hac vice</i>)  <b>David Seligman</b> (admitted <i>pro hac vice</i>)  <b>Whitney Fogelberg</b> (admitted <i>pro hac vice</i>)  Kirkland &amp; Ellis LLP  Kirkland &amp; Ellis International LLP  300 North LaSalle  Chicago, Illinois, 60654  whitney.fogelberg@kirkland.com</p> <p><b>Allyson B. Smith</b> (admitted <i>pro hac vice</i>)  Kirkland &amp; Ellis LLP  Kirkland &amp; Ellis International LLP  601 Lexington Avenue  New York, New York 10022  allyson.smith@kirkland.com</p> <p><b>Laura Davis Jones</b>  <b>Timothy P. Cairns</b>  <b>Peter J. Keane</b>  <b>Edward Corma</b>  Pachulski Stang Ziehl &amp; Jones LLP  919 North Market Street, 17th Floor  PO Box 8705  Wilmington, Delaware 19801  ljones@pszjlaw.com  tcairns@pszjlaw.com  pkeane@pszjlaw.com  ecorma@pszjlaw.com</p> <p><b><i>Counsel to the Debtors</i></b></p>	<p><b>Jane Leamy</b>  <b>Richard Shepacarter</b>  Office of United States Trustee  844 King Street, Suite 2207  Lockbox 35  Wilmington, Delaware 19801  jane.m.leafy@usdoj.gov  richard.shepacarter@usdoj.gov</p> <p><b><i>Counsel to the U.S. Trustee</i></b></p>
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/s/ Benjamin Kelly  
Benjamin Kelly, Deputy Assistant General Counsel